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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

SolarCity Corporation,

Plaintiff,

vs.

Salt River Project Agricultural Improvement
and Power District,

Defendant.

No. 2:15-CV-00374-DLR

***REDACTED - PROPOSED PUBLIC
VERSION***

**PLAINTIFF SOLARCITY
CORPORATION'S SEPARATE
STATEMENT OF UNDISPUTED
FACTS PURSUANT TO LRCIV 56.1**

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TABLE OF ABBREVIATIONS, PERSONS, AND EXHIBIT CITATIONS

PI-[citation] prefix	<p>Refers to tabs used in Volumes 1 and 2 of Mr. Rodriguez declarations lodged in support of SolarCity's previously submitted Motion for Preliminary Injunction. Those Volumes are located at Docket Numbers 159 and 160, respectively.</p> <p>The Docket Number and Docket Attachment Number of the specific document follow in parentheses.</p> <p>Thus, for example, "PI-Kalt Rep. ¶ 1 (Dkt. No. 160-33)" refers to Docket Number 160, Attachment Number 33. It can be found in the printed Volume Two of the Rodriguez Preliminary Injunction declaration behind the "Kalt" tab.</p>
SJ-[citation] prefix	<p>Refers to the tabs used in Volumes 1 and 2 Mr. Rodriguez's declaration lodged in support of the present Motion for Summary Judgment.</p>
[Name] citations	<p>Refer to the deposition testimony of the named person. The same names identify the excerpted deposition testimony attached to the Rodriguez declarations.</p> <p>Thus, for example, "Bonsall" refers to Mr. Bonsall's deposition, the cited excerpts of which can be found behind the "Bonsall" tab.</p>
SRP-[Bates] citations	<p>Refer to documents produced in this matter by SRP. The Bates numbers are used for the exhibit number attached to the Rodriguez declarations.</p>
Association	<p>The Salt River Valley Water Users' Association, a for-profit company benefitting a specific group of landholders. <i>Salt River Valley Water Users' Association</i>, 549 P.2d 162, 193 (Ariz. 1976); Hulet 19:25-20:3.</p>
Bonsall	<p>Mark Bonsall, SRP's General Manager. Bonsall 8:22-23.</p> <p>Mr. Bonsall is SRP's chief executive, reporting to the Board. <i>Id.</i> 10:13-15. He is responsible for SRP's day-to-day operations. <i>Id.</i> 12:2-8.</p>

1	Brown	Mr. Ashley Brown, Executive Director of the Harvard Electricity Policy Group, is a non-faculty consultant retained by SRP during the 2014-15 price process. Brown 12:14-22, 14:8-10, 35:3-20.
2	Coggins	John Coggins, SRP's Senior Director for Power Delivery and former Senior Director for System Operations and Power System Planning and Engineering. Coggins 10:20-11:9. Prior to 2011, Mr. Coggins was the Manager of Resource Planning and Development. <i>Id.</i> 12:21-23. Mr. Coggins' job responsibilities have included planning, development, and maintenance for transmission and distribution systems. Coggins 11:18-12:20. SRP identified Mr. Coggins as the sole technical person in their Rule 26 initial disclosures who could speak to SRP's purported cost and technical justifications. SJ-5/15/16 SRP Initial Disclosures, 4th Supplement at 10.
3		
4		
5		
6	Cooper	Thomas Cooper, SRP's Director of Resource Planning and Development. Cooper 14:8-11. Mr. Cooper oversees long-term energy resource planning. He also oversees the resource acquisition and development group, which is responsible for implementing the resource plan. <i>Id.</i> 14:8-24.
7		
8		
9		
10	Duncan	Dean Duncan, SRP's Senior Director of Strategy, Load Forecasting, Load Research, and Archives. Duncan 9:23-10:18. Mr. Duncan is responsible for "leading the development of corporate strategy," among other things. <i>Id.</i> 10:19-23.
11		
12		
13		
14	Faruqui	Dr. Ahmad Faruqui, who holds himself out as a rate design expert and an economist with The Brattle Group, is a consultant retained by SRP during the 2014-15 price process. Faruqui 14:22-17:9, 62:12-17.
15		
16		
17		
18	Hendrickson	Deborah Hendrickson, an SRP board member since 2007. In addition, she held official SRP governance positions since 2000. Hendrickson 5:21-7:5.
19		
20		
21		

1	Hoopes	John Rand Hoopes, SRP's Vice President since 2010. In addition, he has held official SRP governance positions since 1998. Hoopes 7:9-8:7.
2		
3	Hulet	Steven Hulet, SRP's Corporate Treasurer and direct supervisor of SRP's pricing group for much of E-27's design and during the price process. Hulet 8:20-12:1.
4		
5		
6		In his capacity as Treasurer, Mr. Hulet is an SRP officer. <i>Id.</i>
7		Mr. Hulet is also a 35-year veteran of SRP who has held positions throughout the company. <i>Id.</i>
8	Kalt	Prof. Joseph Kalt, Harvard economics professor Emeritus and an Arizona native who resides principally in Tucson. PI-Kalt Rep. ¶¶ 1-5, 7 (Dkt. No. 160-33); Kalt Tr. 25:19-24, 109:15-21.
9		
10		Prof. Kalt is SolarCity's principal economic expert in this case.
11		
12	Katz	Dr. Michael Katz, SRP's economic expert hired for this case (as opposed to those experts and purported experts that SRP hired to write in favor of E-27 during the price process).
13		
14		Dr. Katz is a professor at the University of California at Berkeley. PI-Katz Rep. ¶¶ 1, 8 (Dkt. No. 160-35).
15		
16	L. Rive	Lyndon Rive, CEO of SolarCity. He cofounded the company with his brother Peter Rive. L. Rive 9:12-22.
17		
18	Mace	Mr. Michael Mace, Managing Director of Public Financial Management ("PFM"), was retained by SRP during the 2014-15 price process to write in support of rate increases. Mace 18:23-19:13, 47:16-49:22.
19		
20		
21	Nieto	Ms. Amparo Nieto, Vice President of NERA Economic Consulting, was retained by SRP during the 2014-15 price process. Nieto 31:10-32:4, 54:24-57:13.
22		
23		
24	McSheffrey	Aidan McSheffrey, SRP's Chief Financial Executive and Associate General Manager since 2011. McSheffrey 13:23-14:17.
25		
26		
27	Pease	Robert Pease, SolarCity's Director of Sales Strategy and Operations. Pease Decl. ¶ 1.
28		

Singleton	Lori Singleton, the manager responsible for SRP’s solar programs. Singleton 9:21-10:3, 10:24-11:8, 36:25-37:3.
SolarCity	Plaintiff SolarCity Corporation.
SRP	Defendant Salt River Project Agricultural Improvement & Power District.
Tierney	Dr. Susan Tierney, Senior Advisor at Analysis Group, is a purported regulatory expert that SRP hired for this case. Tierney 112:11-113:4. Ms. Tierney is not an antitrust economist. <i>Id.</i>
Tucker	John Tucker is SRP’s manager of rate design. Tucker 11:1-10.

1 **Plaintiff and Defendant’s Relevant Offerings to Customers**

2 ***SolarCity’s Relevant Offerings to Customers***

3 1. In Arizona, SolarCity offers distributed solar systems for lease, for sale
4 (either outright or via a purchase-with-loan option), or by way of Solar Services
5 Agreements (“SSAs”). Pease Decl. ¶¶ 2-7; L. Rive 187:8-15, 188:8-12; P. Rive 12:2-
6 13:10.

7 2. SolarCity’s leases and sales (regardless whether outright or via purchase-
8 and-loan) are priced based on a per kilowatt-hour (“kWh”) rate, representing a unit price
9 for the amount of electricity generated and used. P. Rive 124:7-125:25; Pease 19:3-17;
10 Pease Decl. ¶¶ 4-7; PI-Kalt Rep. ¶ 18 (Dkt. No. 160-33).

11 3. [REDACTED]
12 [REDACTED] L. Rive 187:8-15; P. Rive
13 124:7-125:25.

14 4. SolarCity’s services overlap with utility services. L. Rive 154:16-155:3,
15 156:8-18.

16 5. SolarCity views utilities as its main competitors in their respective service
17 areas. L. Rive 159:20-160:7; Pease 108:15-24; Serra 133:9-14.

18 ***SRP’s Relevant Offerings to Customers***

19 6. SRP sells electricity to consumers. PI-Ratebook (Dkt. No. 160-5); SJ-PX
20 123 at -449; SJ-SRP Facts.

21 7. SRP’s electric prices use an express per kWh rate—i.e., they all use a unit
22 price for electricity. SJ-PX 123 at -490-91.

23 **Market Definition—Product Market for Retail Provision of Electricity**

24 ***Reasonable Interchangeability and Consumer Substitution***

25 8. Electricity generated by rooftop solar systems is reasonably interchangeable
26 with power purchased from a traditional utility.

27 Q. Is the electricity generated by the rooftop solar system reasonably
28 interchangeable with the displaced electricity from SRP? A. Yes, it is. (Bonsall
71:5-8.)

1 Q. So the power generated by rooftop solar is interchangeable with the power
2 provided by SRP? [objection omitted] . . . A. Used for the same purpose, if by
3 that, you mean, used for the same purpose, I would say that they can use either
one, yes.” (Hendrickson 92:6-19.)

4 Hoopes 96:22-98:18; Katz Tr. 31:9-33:21; Kalt Tr. 179:6-16, 181:7-13; PI-Fenster Decl.
5 ¶ 4 (Dkt. No. 160-27).

6 9. Power produced by consumer rooftop solar displaces or replaces power
7 purchased from a traditional utility such as SRP.

8 [REDACTED]
9 [REDACTED]
10 [REDACTED] (PI-PX 26 at -446 (Dkt. No. 159-5).)

11 Q. Mr. McSheffrey, do you agree that when a customer installs and uses rooftop
12 solar, that SRP’s revenues decrease? [objection omitted] A. Yes. Revenues are
13 reduced when energy is produced by the -- by the distributed generation system.
14 Q. Why is that? A. Because it displaces energy that is otherwise sold by SRP to
15 that customer. Q. What do you mean “displaces”? A. It means if the customer is
16 consuming a kilowatt-hour of electricity and their distributed generation system is
17 producing a kilowatt-hour of electricity that is serving that need, absent that
18 distributed generation, SRP would be in the position of having to serve that
19 kilowatt-hour.” (McSheffrey 32:23-33:15.)

20 Q. . . . And does some of that electricity produced by the solar system displace
21 some of the electricity that the customer buys from SRP? A. Yes, it would. Q.
22 And in that sense, is it a substitute for that electricity? [objection omitted] THE
23 WITNESS: Yes, it is. (Bonsall 70:12-19.)

24 Q. Is that another way of saying that rooftop solar substitutes for some SRP-
25 provided electricity? [objection omitted] A. It -- yeah, it produces electricity that
26 SRP otherwise does not need to produce. (McSheffrey 33:16-20.)

27 [REDACTED]
28 [REDACTED] (McSheffrey
34:6-12.)

26 Cooper 193:21-194:6 (distributed generation is “a substitute good, if you will, for
27 reliability that the -- the grid provides”); Hendrickson 92:6-19; Katz Tr. 31:9-33:21;
28 Hoopes 96:22-98:18; Brown 141:23-142:8; Tierney Tr. 216:2-9; Coggins 132:1-133:1 &

1 SJ-PX 261.

2 **10.** Consumers' adoption of rooftop solar has the ability to, and does, reduce
3 SRP's revenues.

4 [REDACTED]
5 [REDACTED]. (Nieto 42:2-8.)

6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 (SJ-PX 248 at p. 2.)

11 SJ-PX 154; PI-PX 60 at -145 (Dkt.159-15); PI-PX 82 at -982 (Dkt. No. 159-22); SJ-PX
12 97 at 2; PI-PX 64 at 17 (Dkt. No. 149-16); PI-PX 55 at slide 21 (Dkt. No. 159-11).

13 ***SRP, Its Agents, and Other Industry Participants Recognize in the Ordinary***
14 ***Course That There Is a Retail Market Where Rooftop Solar And Utilities***
15 ***Compete***

16 **11.** [REDACTED]

17 [REDACTED]
18 [REDACTED]

19 **12.** [REDACTED]

20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

26 **13.** At least [REDACTED] of SRP's own experts—[REDACTED] it hired to review E-27 during
27 the 2014-15 Price Process and the [REDACTED]—admit that
28 consumer rooftop solar, including that provided by SolarCity, competes with utility-

1 provided electricity.

2 Q: “. . . And you consider new entrants such as SolarCity to be competition to the
3 utilities; correct? [objection omitted] A: Yes. And what I was specifically referring
4 to is that they are providing customers the means by which to generate their own
5 power as opposed to buy it from the grid.” (Faruqui 174:15-175:5; *see also*
6 104:15-23, 105:9-106:24.)

7 Katz Tr. 153:8-154:22; Mace 87:15-88:7; Nieto 42:2-8, 43:19-44:3.

8 **14.** [REDACTED]

9
10 **15.** SRP knew external actors also recognized that rooftop solar introduced
11 competition to utilities. SJ-SRP-AZ-00174741 & SJ-SRP-AZ-00174742 at -747-48
12 (circulating utility trade group publication that “addresses [utilities’] possible strategic
13 responses to competitive threats in order to protect investors and capital availability” in
14 the face “disruptive technologies” including “solar photovoltaics”; recognizing
15 distributed solar is an “ongoing competitive threat”—specifically “to the centralized
16 utility service model”); SJ-SRP-AZ-00015827 (emailing a Forbes article to the same
17 effect; produced from chief executive Bonsall’s files as shown by the SRP-produced
18 metadata at SJ-SRP-AZ-00015827-M); SJ-PX 96 [REDACTED]
19 [REDACTED]).

20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 ¹ [REDACTED]
26 *Compare, e.g.,* PI-PX 59 at -103, -130, -131, -133, -142, -147, -149 (Dkt. No. 159-14)
27 *with, e.g.,* PI-PX 60 at -137, -138 & -143 (Dkt. No. 159-15), PI-PX 64 at slides 2, 6-12
28 (Dkt. No. 159-16), PX 67 at -026-030 (Dkt. No. 159-18), Singleton 145:2-146:19, and
PI-PX 68 at slides 2, 6 (Dkt. No. 159-19).

[REDACTED]

[REDACTED]

[REDACTED]

17. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (PI-PX 112 (Dkt. No. 159-32).)

SJ-PX 113 (“The customer relationship is the ‘ultimate prize’.”); SJ-PX 92; SJ-PX 109; PI-PX 64 at slide 17 (Dkt. No. 149-16) & Singleton 138:1-11.

Customers View Rooftop Solar and SRP-Provided Electricity As Substitutes

18. SRP customers perceive electricity provided through rooftop solar and electricity from SRP as commercially practical substitutes. PI-[REDACTED] ¶ 2 (Dkt. No. 160-52); PI-[REDACTED] ¶ 2 (Dkt. No. 160-23); PI-[REDACTED] ¶ 2 (Dkt. No. 160-39); PI-[REDACTED] ¶ 2 (Dkt. No. 160-29).

Price Competition / Cross-Elasticity of Demand

19. SolarCity's main factor in pricing its rooftop solar systems is to price below utility pricing. Pease 19:12-17; L. Rive 132:3-15; P. Rive 119:15-24.

20. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

21. Until SRP engaged in the conduct challenged in this case, consumer rooftop solar grew as SRP continued to raise its rates to its electricity customers. Hulet 75:22-81:2; Hulet 192:20-195:9; Duncan 93:5-93:21; PI-PX 66 at -276; PI-PX 55 at slide 15; PI-PX 60 at 154-55; PI-PX 180 at 2 (Dkt. No. 159-44).

1 ***SRP Can Offer No Economic Opinion to the Contrary***

2 **22.** [REDACTED]

3 [REDACTED] Katz
4 Tr. 154:8-22.

5 **23.** [REDACTED]

6 [REDACTED]
7 [REDACTED] Katz Tr. 33:23-35:2.

8 **24.** The experts SRP hired for this litigation did not consider customer
9 declarations or talk to customers. Katz Tr. 212:10-213:3; Tierney Tr. 52:13-16.

10 ***SSNIP (Hypothetical Monopolist Test)***

11 **25.** SRP's 2014-15 Price Process showed that SRP has the power to impose and
12 maintain small but significant electric price increases for a nontransitory period. SJ-PX
13 123 at -455 ("Specifically, SRP management proposes an overall annual average price
14 increase of 3.9 percent."); *see also id.* at -464 (chart summarizing total annual price plan
15 changes by customer class, indicating that price increases ranged from 2.9% to 5.9%);
16 Kalt Tr. 195:13-196:8; PI-Kalt Rep. ¶¶ 109-24 (Dkt. No. 160-33).

17 **Market Definition—Geographic Market**

18 ***Consumers Within Geographic Area Cannot Arbitrage***

19 **26.** Retail customers within SRP's service area cannot purchase electricity from
20 outside that service area.

21 [Q. H]as SRP agreed not to provide electricity in APS territory? [objection
22 omitted] THE WITNESS: And vice versa, yes. . . . Q. So is it fair to say with that -
23 - with that as an example, that retail electricity customers in SRP's territory can't
24 reasonably substitute electricity procured outside SRP's territory? A. Yes."
(Bonsall 62:9-19.)

25 Katz Tr. 43:11-45:9.

26 ***SRP Recognizes It Controls Its Geographic Area***

27 **27.** [REDACTED]

28 [REDACTED]

1 [REDACTED]
2 PI-PX 95 (Dk. No. 159-29) at -387.

3 **28.** SRP’s economic expert agrees “that a correctly defined relevant market
4 very likely would have geographic boundaries corresponding to the District’s electric
5 service territory, at least with respect to residential customers,” and has offered no
6 opinion that the result is different for non-residential customers. PI-Katz Rep. ¶ 138
7 (Dkt. No. 160-35); Katz Tr. 43:11-45:9 (solar customers “within SRP’s territory” still
8 need SRP-provided electricity).

9 **Monopoly Power**

10 ***Consumers Recognize SRP’s Monopoly Power***

11 **29.** Consumers within SRP’s service recognize that they have no reasonable
12 choice but to purchase SRP-provided electricity. SJ- SRP-00003468 at -489 (“That you
13 have a monopoly on service is infuriating--if there was any way to go off the grid or
14 switch to another company I’d do it in a heartbeat.”); SJ-SRP-00002297 at -303 (“Let’s
15 face it - SRP is a monopoly. Those of us on their grid have nowhere else to turn to for
16 electricity. This smacks of a monopolistic tactic to eliminate what little competition they
17 have.”); SJ-SRP-00002986 at -302 (“It’s time that the public has the ability to provide
18 their own electricity. I’m tired watching the power companies having such a monopoly
19 over our rates.”); SJ-SRP-00001992 at -044; PI-[REDACTED] Decl. ¶ 4 (Dkt. No. 160-39); PI-
20 [REDACTED] Decl. ¶ 5 (Dkt. No. 160-52); PI-[REDACTED] Decl. ¶ 6 (Dkt. No. 160-29); PI-[REDACTED]
21 [REDACTED] ¶¶ 1, 4 (Dkt. No. 160-26).

22 ***SRP Has Power Over The Price of Retail Electricity in SRP Territory***

23 **30.** [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

(Rodgers 30(b)(6) (May 12, 2016) 37:22-38:5.)

(Tucker 19:16-20:4.)

(Tucker 21:12-15.)

(SJ-PX

175 ().)

Rodgers 30(b)(6) (May 12, 2016) 31:17-32:17, 34:12-38:16.

31. SRP's 2014-15 Price Process showed that SRP has the power to impose and maintain small but significant electricity price increases for a nontransitory period. *See supra* ¶ 25.

SRP Has Power to Exclude Retail Electricity Competition in SRP Territory

32. Singleton 168:19-169:9, 221:9-222:4 & SJ-PX 83 (PI-Kalt Figs. 7A, 7B, 29A-D, 30A-31D (Dkt. No. 160-34) (FRE 1006).

33. Singleton 221:2-18; PI-PX 30 (Dkt. No 159-7).

34. PI-PX 71 at -271 (Dkt. No. 159-20); SJ-SRP-AZ-000838988; Singleton 167:22-169:9, 221:9-222:4; PI-PX 30 (Dkt. No. 159-7).

35. the firms that

1 stayed saw their businesses drop dramatically. PI-PX 84 at -397 (Dkt. No. 159-23); PI-
2 Fenster ¶¶ 5-6 (Dkt. No. 160-27) (nation’s largest residential solar installer, Sunrun, sold
3 284 systems in SRP’s service area in 2014; continued offering but sold eight in 2015;
4 sold two more in 2016 as of mid-2016); PI- [REDACTED] Decl. ¶¶ 3-4 (Dkt. No. 160-53) ; PI-
5 [REDACTED] Decl. ¶¶ 3-4 (Dkt. No. 160-47).

6 ***The Retail Electricity Market in SRP’s Service Area Has High Barriers to Entry***

7 **36.** Consumers recognize that going off the grid is not a viable economic
8 substitute at this time. SJ-SJ-SRP-00003468 at -489 (“That you have a monopoly on
9 service is infuriating--if there was any way to go off the grid or switch to another
10 company I’d do it in a heartbeat.”); SJ-SRP-00002297 at -303 (“Let’s face it - SRP is a
11 monopoly. Those of us on their grid have nowhere else to turn to for electricity. This
12 smacks of a monopolistic tactic to eliminate what little competition they have.”); PI-
13 [REDACTED] ¶ 4 (Dkt. No. 160-26); PI- [REDACTED] ¶ 5 (Dkt. No. 160-52).

14 **37.** SRP operates the only electric distribution grid in its service territory.

15 [REDACTED]
16 [REDACTED]
17 [REDACTED] (SJ-PX 21.)

18 Katz Tr. 43:11-45:9; Duncan 46:18-23; Coggins 224:24-225:6; Duncan 46:11-47:13

19 **38.** Other barriers to entry reinforce SRP’s monopoly power, including
20 “control of and access to customer information,” the absence of “standardization and
21 interoperability,” the absence of “access to the grid and market information,” “absence of
22 meter ownership control and billing.” Brown 86:2-88:21.

23 **39.** [REDACTED]

24 [REDACTED]
25 [REDACTED] PI-Ratebook at 28 (Dkt. No. 160-5).

26 **40.** Interconnection to SRP’s grid is also essential for a customer to export
27 locally generated electricity to other customers when the customer’s rooftop solar system
28 generates more electricity than he uses. Singleton 203:16-204:2; SJ-PX 79.

1 **41.** Rooftop solar is the only significant competitor to SRP in the retail
2 provision of electricity in SRP territory. PI-Rogs at 11 (Dkt. No. 160-4); SJ-District’s
3 Resp. to Pl.’s Second Set of Interrogs., Response to Interrogatory No. 3 at 10.

4 ***SRP Recognizes its Monopoly Market Share***

5 **42.** SRP views itself as a monopolist. Tucker 20:5-12 [REDACTED]
6 [REDACTED]; Bonsall 61:12-24 (“We don’t really have
7 any competitors. We have a dedicated service territory.”); SRP- PI-PX 95 (Dk. No. 159-
8 29) at -387 ([REDACTED]
9 [REDACTED]
10 [REDACTED]).

11 **43.** SRP’s proffered non-economic experts in this case agree that SRP is a
12 monopolist. Tierney Tr. 30:10-12, 32:22-25; Nieto 145:19-146:19.

13 Dated: September 15, 2016

Respectfully submitted,

14 BOIES, SCHILLER & FLEXNER LLP

15 By: s/Steven C. Holtzman

16 Steven C. Holtzman

17 *Attorneys for Plaintiff SolarCity Corporation*
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ECF ATTESTATION OF FILER

I, Steven C. Holtzman, am the ECF User whose ID and password is used to file this document and its associated attachments and lodged materials. Certain of these attachments and lodged materials bear the electronic signature of Sean P. Rodriguez or Nina Eisenberg. I hereby attest that each of those persons has expressly approved and concurred in filing under their electronic signature.

Dated: September 15, 2016

s/Steven C. Holtzman

Steven C. Holtzman

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on September 15, 2016, I electronically transmitted the
3 attached document to the Clerk's Office using the CM/ECF System for filing and
4 transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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